

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

CARLOS KALMAR, et al.,)	CASE NO.: 1:24-cv-00193
)	
Plaintiffs,)	JUDGE: BRIDGET MEEHAN BRENNAN
)	
-v-)	MOTION FOR ORDER TO EXCEED
)	PAGE LIMITATION ON
THE CLEVELAND INSTITUTE OF)	MEMORANDUM IN SUPPORT OF
MUSIC, et al.,)	PARTIAL MOTION TO DISMISS
)	
Defendants.)	
)	

Defendants The Cleveland Institute of Music, Scott Harrison, Dean Southern, and Paul Hogle (the “CIM Defendants”) plan to file a Partial Motion to Dismiss on or before the responsive pleading deadline of March 15, 2024. The CIM Defendants respectfully move this Honorable Court for an order permitting them to exceed the 20 page limitation for substantive motions before the Case Management Conference. Pursuant to this Court’s Standing Order, Section V.B, the CIM Defendants state as follows:

- (1) Plaintiffs’ Amended Complaint (ECF Doc. 4) alleges 12 causes of action against one or more of the CIM Defendants. The CIM Defendants request that this Court permit them to file a Memorandum in Support of their Partial Motion to Dismiss of up to 30 pages, in order to properly address the pertinent allegations and applicable law regarding multiple causes of action.
- (2) Undersigned counsel contacted counsel for all other parties, who have stated their positions as follows:
 - a. Defendant Vivian Scott stipulates to this Motion.
 - b. Plaintiffs do not oppose this Motion and defer to the Court.

The CIM Defendants attach a proposed Order granting this Motion for the Court's convenience.

Respectfully submitted,

/s/ Monica L. Lacks

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Music, Scott Harrison, Dean Southern and Paul
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CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2024, a copy of the foregoing *Motion* was electronically filed with the Clerk of Court using the CM/ECF system. Notice of filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Monica L. Lacks

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One of the Attorneys for Defendants